

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

CR23-182 JD

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UNITED STATES OF AMERICA,

v.

GIOVANNI VASSALO,

DEFENDANT(S).

**FILED**

Jun 13 2023

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

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## INDICTMENT

18 U.S.C. § 13 – Assimilating California Penal Code Section 314(1) (Class C  
felony)

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A true bill.

/s/ Foreperson of the Grand Jury

\_\_\_\_\_  
Foreman

Filed in open court this 13th day of

June 2023.

M. Jack  
\_\_\_\_\_  
Clerk

Bail, \$ Summons

Sallie Kim  
Magistrate Judge Sallie Kim

FILED

1 ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney  
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Jun 13 2023

3 Mark B. Busby  
4 CLERK, U.S. DISTRICT COURT  
5 NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA, ) CASE NO. CR23-182 JD  
12 Plaintiff, )  
13 v. ) VIOLATION:  
14 GIOVANNI VASSALO, ) 18 U.S.C. § 13 – Assimilating California Penal Code  
15 Defendant. ) Section 314(1) (Class C felony)  
16 )  
17 ) SAN FRANCISCO VENUE  
18 )

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20 I N D I C T M E N T

21 The Grand Jury charges:

22 COUNT ONE: (18 U.S.C. § 13 – Assimilating California Penal Code Section 314(1))

23 On or about November 27, 2022, in the Northern District of California, within the Special  
24 Maritime and Territorial Jurisdiction of the United States, the defendant,

25 GIOVANNI VASSALO,

26 did willfully and lewdly expose his person and private parts thereof in a public place and in a place  
27 where there were present other persons to be offended and annoyed, specifically, by exposing his  
28 genitals and masturbating, while in a public area, in violation of Title 18, United States Code, Section

1 13, assimilating California Penal Code Section 314(1), a class C felony.  
2  
3  
4

DATED: June 13, 2023

A TRUE BILL.

6 /s/ Foreperson  
7 FOREPERSON  
8 ISMAIL J. RAMSEY  
9 United States Attorney  
10 /s/ Anna Nguyen  
11 ANNA NGUYEN  
12 Special Assistant United States Attorney  
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**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY:  COMPLAINT  INFORMATION  INDICTMENT SUPERSEDING**OFFENSE CHARGED**18 U.S.C. § 13 – Assimilating California Penal Code Section  
314(1) (class C felony)

Petty  
 Minor  
 Misdemeanor  
 Felony

PENALTY: Max. imprisonment 3 year; Max. probation 5 years; Max. fine  
\$10,000; and register as a sex offender for 10 years

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

**DEFENDANT - U.S.**

Giovanni Vassalo

## DISTRICT COURT NUMBER

CR23-182 JD

**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1)  If not detained give date any prior summons was served on above charges →  
 2)  Is a Fugitive  
 3)  Is on Bail or Release from (show District)

San Francisco County

**IS IN CUSTODY**

4)  On this charge  
 5)  On another conviction  
 6)  Awaiting trial on other charges  
 If answer to (6) is "Yes", show name of institution

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 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO

State

Has detainer  Yes  
been filed?  No} If "Yes"  
give date  
filed

Month/Day/Year

**DATE OF ARREST**

Or... if Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED  
TO U.S. CUSTODY**

Month/Day/Year

 This report amends AO 257 previously submittedName and Office of Person  
Furnishing Information on this form Ismail J. Ramsey U.S. Attorney  Other U.S. AgencyName of Assistant U.S.  
Attorney (if assigned) Anna Nguyen**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:** SUMMONS  NO PROCESS\*  WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

 Arraignment  Initial Appearance

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

1310 Fillmore Street, #401, San Francisco California 94115

Date/Time: July 20, 2023 10:30 AM Before Judge: Alex G. Tse

Comments: Courtroom 14, Floor 18

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**CRIMINAL COVER SHEET**

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**Instructions:** Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

**CASE NAME:**

USA v. GIOVANNI VASSALO,

**CASE NUMBER:** CR23-182 JD

CR

**Is This Case Under Seal?**

Yes      No

**Total Number of Defendants:**

1  2-7  8 or more

**Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?**

Yes      No

**Venue (Per Crim. L.R. 18-1):**

SF  OAK  SJ

**Is this a potential high-cost case?**

Yes      No

**Is any defendant charged with a death-penalty-eligible crime?**

Yes      No

**Is this a RICO Act gang case?**

Yes      No

**Assigned AUSA  
(Lead Attorney):** Anna Nguyen

**Date Submitted:** 6/13/2023

**Comments:**